

EXHIBIT 1

IN THE COURT OF COMMON PLEAS

Ohio

County of Cuyahoga

SS

FILED

2014 JUN 20 P 4:42

Judge: SHIRLEY STRICKLAND SAFFOLD

CV 14 828706

VIDAA Saeed

PLAINTIFF
CLERK OF COURTS
CUYAHOGA COUNTY

AFFIDAVIT OF INDIGENCE

vs

American Traffic Solutions
Inc. Defendant

CV14828706

84773733



VIDAA Saeed, being first duly sworn, says that VIDAA Saeed is the Plaintiff in the above captioned matter and has not sufficient funds to pay the security for costs in this action pursuant to Local Rules and submits the following information in support of said allegation of property:

PLACE OF EMPLOYMENT not employedLENGTH OF TIME EMPLOYED From N/A To N/AGROSS WEEKLY INCOME \$ N/ATOTAL GROSS INCOME FROM ALL SOURCES IN LAST TWENTY-SIX (26) WEEKS \$ 5988

TOTAL ASSETS:

CASH ON HAND OR ON DEPOSIT \$ 10.00REAL ESTATE N/A MARKET VALUE \$ N/A MORTGAGES \$ N/AVALUE OF AUTOMOBILE \$ N/A

I hereby represent that the information set forth above concerning my financial condition is true and complete to the best of my knowledge and belief.

X

SWORN TO AND SUBSCRIBED IN MY PRESENCE this 20th day of June, 2014



CLAUDIA DEROSA
NOTARY PUBLIC
STATE OF OHIO
Recorded in
Cuyahoga County
My Comm. Exp. 12/11/18

Notary Public - SIGNATURE



COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

FILED

2014 JUN 20 P 4:27

VIDAH SAEED
1617 Allegheny Circle
East Cleveland, Ohio 44112
Plaintiff

vs.

AMERICAN TRAFFIC SOLUTIONS , INC.
1330 W. Southern Ave.
Tempe, AZ 85282
Defendant

JUDGE
CLERK OF COURTS
CUYAHOGA COUNTY

Judge: SHIRLEY STRICKLAND SAFFOLD

CV 14 828706

COMPLAINT
TRAFFIC LIGHT CAMERAS

I, Vidah Saeed, the Plaintiff, hereby assert the below claim against Defendant American Traffic Solutions, Inc. In conjunction with my complaint, I am seeking \$5,000,000.00 (five million dollars) in damages from the defendants for their actions and intentions and tort against me.

I attest that as a citizen of Ohio born and raised in the United States even as defined by the United States Constitution, in **Amendment XIV, Section 1, Clause 1** which states that "all persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside", my 14th Amendment has been violated by Defendant American Traffic Solutions, Inc. The Defendant, American Traffic Solutions, Inc's street cameras have deprived me of my pursuit of life, liberty and the pursuit of happiness in the following ways:

The **Privileges or Immunities Clause** in **Amendment XIV, Section 1, Clause 2** states that:

No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States....

It violates my privileges and immunities when I travel from city to city or from suburb to suburb within the same city or county and I don't feel I'm allowed to make the same traffic errors as

others would be able to in areas where they do not have cameras (such as going an inch too far over a white line or making a split second complete stop before I make a right turn when there is no other vehicle present). I'm also being in fear of a man made device capturing my image falsely, creating unnecessary mental and emotional distress that can contribute to paranoia or a wandering thoughts from either a faulty man made mechanism or intentional action, which other petitioners have experienced also; it has also caused me to have one or more disputable tickets and even a growing number of tickets that seem to be adding up as I attempted to travel just around the same corner several times a week from my home that I have to worry about being charged for and have to fight in court, putting me at risk of losing driving privileges, causing me to reduce or change driving patterns to avoid a safer corner that I can't avoid passing near my street which would further hinder my safety and progress, I have the inability to fulfill transportation needs to pursue errands, visit a sick relative or work in time, enjoyment, and comfort

I don't feel that I, my family, and the community in which I chose to live are treated equally and fairly as citizens of the United States as not all areas have the street light cameras in their vicinity and can therefore live in peace and don't have to worry about additional resources being taken from them. Even so other nearby areas who do not have a high percentage of residents living in poverty do not have to worry about being drained of what little they have valid or not valid over simple errors such as the above mentioned.

The Fifth Amendment to the United States Constitution

provides that :

"nor shall any person . . . be deprived of life, liberty, or property, without due process of law"

Amendment XIV, Section 1, Clause 3

"...nor shall any State deprive any person of life, liberty, or property, without due process of law"

The Defendants and actions of the Defendants violates Due Process which is defined as a citizen's entitlement of fair treatment through the normal judicial system, in which I as a

citizen was not asked if I agreed to the traffic cameras being placed in my community prior to their installation, and, even so, I fought for their removal and publicly complained constantly in behalf of myself and the community that the cameras were a violation to me and our rights, life, liberty, equality, and the pursuit of happiness. I have also filed petitions of hundreds of residents who agreed with me they did not want traffic cameras in our community. There were even instances when the cameras have flashed when there were no vehicles around which make the cameras conspicuous to some unlawful surveillance of the community of residents who walk the streets not for the purpose they were said to be intended for. This means that the cameras are faulty and is a negligence and are destined for error unless the defendants are willing to admit that the cameras flashing without any vehicles around are an intentional effect. In this sense, it was intended to cause emotional distress. I was cited at the corner of Mayfair and Hayden an area where it is impossible to go more than 10 miles an hour turning the corner on my way home heading down Mayfair where there is also two speed limits on Hayden before and after that corner. I dispute the validity of that ticket. My liberty has then been violated as I or anyone else will have to take valuable time to do something that is neither constructive nor progressive to their lives, further causing unnecessary distress and prevention of progress.

And as we know, East Cleveland has it hard already, and the Defendants have been intentional in making my life, my families lives, and the lives of other residents whom I represent that much harder and it is only doing more damage to the city in which I live. Not only is it making residents such as myself more frustrated and in fear of travelling about freely in or without our vehicles, it has caused property values to go down and closed businesses and conveniences because few want to live or travel through the communities because of the cameras; it is causing disinvestment and disenfranchising of the community in which I live and me and my family therefore cannot get and cannot benefit from the amenities comparable to other communities who do not have the problem placed in their communities by the Defendants and are able to thrive and prosper and not be subject to local or national ridicule. When the

media ridicules my community in which I live, it ridicules me. That affects my comfort and the comfort of residing family and visiting family as well, and available resources for their education and enjoyment and economic prosperity and public relations; and again that affects me when we cannot enjoy equal rights and non-stereotypical relations of more economically advantaged communities who do not have to deal with street cameras, and, therefore, Defendants American Traffic Solutions, Inc. seem to be engaging in a discriminatory practice. Also, I have a hard time as it is to obtain resources than to turn around and have it taken away from me nearly \$100 (one hundred dollars) at a time. This hurts me, my progress, my business endeavors, mental and emotional health, environment, my economic stability, my family.

The Equal Protection Clause at the end of Section 1 of the Fourteenth Amendment states:


All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; *nor deny to any person within its jurisdiction the equal protection of the laws.*

As a Citizen of the United States, of the State of Ohio, of the Cuyahoga County, of Greater Cleveland and of East Cleveland City wherewith I reside, I have been denied equal protection of the laws of the United States. I and the city whom I represent are not been treated fairly by Defendant American Traffic Solutions, Inc. by having the audacity to place a street camera in my community which is violating my 14th Amendment rights and the practice of placing these cameras in strategic poor community such as East Cleveland to potentially drain them of their own resources is a discriminatory practice, and it denies me equal protection, and it had been an inconvenience to avoid the camera locations even so when I am being a driver or being chauffeured, causing unnecessary expense with gas, cost for transportation assistance, and time. Furthermore, the street cameras have taken away jobs from police officers making me more fearful of my environment than I should be, and I hear gunshots almost every day. It has

also affected the resources in this community in a way which deprives the city in which I reside of necessary grants allocated for a properly policed community, therefore backfiring any purpose for providing safety for me in my community.

I further attest that I am not filing a frivolous lawsuit with any intent to harass the Defendants or to maliciously persecute them or to abuse this process. I do not want the street cameras in the area where I live, in the neighborhood where I or those who attempt to visit me travel, family or other, and they have witnessed them to be faulty or suspiciously and strategically placed. If anything these cameras are a harassment to me and I'm also affected by how they affect and harass my family and community.

Therefore my prayer for the intentional actions against me and against the area in which I reside and represent as a lawful citizen is to settle \$5,000,000.00 (five million dollars) in damages from the defendants for their actions and intentions and against me.




Vidah Saeed, Plaintiff
Pro Se
1617 Allegheny Circle
East Cleveland, Ohio 44112
(216) 450-7042

CERTIFICATE OF SERVICE

A copy of the aforementioned document COMPLAINT TRAFFIC LIGHT CAMERAS has been sent by regular US mail on this 20th day of June 2014 to the following:

American Traffic Solutions
1330 W. Southern Ave
Tempe, AZ 85282



Vidah Saeed, Plaintiff
Pro Se
1617 Allegheny Circle
Cleveland, Ohio 44112
Plaintiff



**COMMON PLEAS COURT
CUYAHOGA COUNTY, OHIO**

DESIGNATION FORM TO BE USED TO INDICATE THE CLASSIFICATION OF THE CAUSE

VIDAH Saeed
Plaintiff

Judge: SHIRLEY STRICKLAND SAFFOLD

vs.

CV 14 828706

American Traffic Solutions, Inc.
Defendant

Has this case been previously filed & dismissed? Yes ☐ No ☒
Case #: _____ Judge: _____
Is this case related to any cases now pending or previously filed Yes ☐ No ☒
Case #: _____ Judge: _____

CIVIL CLASSIFICATIONS: Place an (X) in ONE Classification Only.

Professional Torts:

- ☐ 1311 Medical Malpractice
☐ 1315 Dental Malpractice
☐ 1316 Optometric Malpractice
☐ 1317 Chiropractic Malpractice
☐ 1312 Legal Malpractice
☐ 1313 Other Malpractice

Product Liability:

- ☐ 1330 Product Liability

Other Torts:

- ☐ 1310 Motor Vehicle Accident
☐ 1314 Consumer Action
☒ 1350 Misc Tort

Workers Compensation:

- ☐ 1550 Workers Compensation
☐ 1531 Workers Comp. Asbestos

Foreclosures:

Utilize Separate Foreclosure
Designation Form

Commercial Docket

- ☐ 1386 (Temp.Sup.R. 1.03)
☐ 1390 Cognovit

Administrative Appeals:

- ☐ 1540 Employment Services
☐ 1551 Other

Other Civil:

- ☐ 1500 Replevin/Attachment
☐ 1382 Business Contract
☐ 1384 Real Estate Contract
☐ 1388 Consumer Debt
☐ 1391 Other Contract
☐ 1490 Foreign Judgment
☐ 1491 Stalking Civil Protection Order
☐ 1501 Misc Other
☐ 1502 Petition to contest Adam Walsh Act
☐ 1503 Certificate of Qualification for Employment

Amount of Controversy:

- ☐ None Stated
☐ Less than \$25,000
☒ Prayer Amount in excess
of 25,000

**Parties have previously attempted one
of the following prior to filing:**

- ☐ Arbitration
☐ Early Neutral Evaluation
☐ Mediation
☐ None

I certify that to the best of my knowledge the within case is not related to any now pending or previously filed, except as noted above.

Firm name (Print or type)

1617 Anthony Cincera

Address

East Cleveland, OH 44112

Address

(216) 450-7042

Phone

VIDAH Saeed
Attorney of Record (Print or type)

Signature

vidah.saeed@gmail.com

Email Address

Supreme Court #

Print

FILED
JUN 20 P 4 42
CLERK OF COURTS
CUYAHOGA COUNTY